IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

IN RE: DEALER MANAGEMENT SYSTEMS ANTITRUST LITIGATION

This Document Relates to All Cases

MDL No. 2817 Case No. 18 C 864

Hon. Robert M. Dow, Jr. Magistrate Judge Jeffrey T. Gilbert

NOTICE OF MOTION

To: All Counsel of Record

PLEASE TAKE NOTICE that on **Friday, October 5, 2018, at 9:15 a.m.**, or as soon thereafter as counsel may be heard, we will appear before the Magistrate Judge Jeffrey T. Gilbert or any judge sitting in his stead, in Courtroom 1386 at the Everett McKinley Dirksen United States Courthouse at 219 South Dearborn Street, Chicago, Illinois, and then and there present **PLAINTIFFS'** MOTION TO COMPEL DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY TO PRODUCE UNREDACTED DOCUMENTS FOR *IN CAMERA* REVIEW, a copy of which is attached and served upon you.

Dated: September 28, 2018 Respectfully submitted,

/s/ Derek T. Ho

Derek T. Ho

KELLOGG, HANSEN, TODD, FIGEL & FREDERICK, P.L.L.C.

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MDL Co-Lead Counsel

¹ For purposes of this motion, "Plaintiffs" excludes the Dealership Class Plaintiffs given their pending settlement with Reynolds.

CERTIFICATE OF SERVICE

I, Derek T. Ho, an attorney, hereby certify that on September 28, 2018, I caused a true and correct copy of the foregoing **PLAINTIFFS' MOTION TO COMPEL DEFENDANT THE REYNOLDS AND REYNOLDS COMPANY TO PRODUCE UNREDACTED DOCUMENTS FOR** *IN CAMERA REVIEW* to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by email to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF system.

/s/ Derek T. Ho

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